

1 **2. TRIAL DOCUMENTS TO BE FILED**

2 At least five calendar days prior to the Final Status Conference, the parties/counsel shall serve
3 and file the following Trial Readiness Documents:

4 **A. TRIAL BRIEFS (OPTIONAL)**

5 Each party/counsel may, but is not required to, file a trial brief succinctly identifying:

- 6 (1) the claims and defenses subject to litigation;
- 7 (2) the major legal issues (with supporting points and authorities);
- 8 (3) the relief claimed and calculation of damages sought; and
- 9 (4) any other information that may assist the court at trial.

10 **B. MOTIONS IN LIMINE**

11 Before filing motions in limine, the parties/counsel shall comply with the statutory notice
12 provisions of Code of Civil Procedure ("C.C.P.") Section 1005 and the requirements of Los Angeles
13 County Court Rule ("Local Rule") 3.57(a). The caption of each motion in limine shall concisely
14 identify the evidence that the moving party seeks to preclude. Parties filing more than one motion in
15 limine shall number them consecutively. Parties filing opposition and reply papers shall identify the
16 corresponding motion number in the caption of their papers.

17 **C. JOINT STATEMENT TO BE READ TO THE JURY**

18 For jury trials, the parties/counsel shall work together to prepare and file a joint written
19 statement of the case for the court to read to the jury (Local Rule 3.25(g)(4)).

20 **D. JOINT WITNESS LIST**

21 The parties/counsel shall work together to prepare and file a joint list of all witnesses that
22 each party intends to call, excluding impeachment and rebuttal witnesses (Local Rule 3.25(g)(5)).
23 The joint witness list shall identify each witness by name, specify which witnesses are experts,
24 estimate the length of the direct, cross examination and re-direct examination (if any) of each, and
25 include a total of the number of hours for all witness testimony. The parties/counsel shall identify all
26 potential witness scheduling issues and special requirements. Any party/counsel who seeks to elicit
27 testimony from a witness not identified on the witness list must first make a showing of good cause to
28 the trial court.

1 **E. LIST OF PROPOSED JURY INSTRUCTIONS**
2 **(JOINT AND CONTESTED)**

3 The parties/counsel shall jointly prepare and file a list of proposed jury instructions, organized
4 in numerical order, specifying the instructions upon which all sides agree and the contested
5 instructions, if any. The List of Proposed Jury Instructions must include a space by each instruction
6 for the judge to indicate whether the instruction was given.

7 **F. JURY INSTRUCTIONS**
8 **(JOINT AND CONTESTED)**

9 The parties/counsel shall prepare a complete set of full-text proposed jury instructions, editing
10 all proposed California Civil Jury Instructions and insert party name(s) and eliminate blanks,
11 brackets, and irrelevant material. The parties/counsel shall prepare special instructions in a format
12 ready for submission to the jury with the instruction number, title, and text only (i.e., there should be
13 no boxes or other indication on the printed instruction itself as to the requesting party).

14 **G. JOINT VERDICT FORM(S)**

15 The parties/counsel shall prepare and jointly file a proposed general verdict form or special
16 verdict form (with interrogatories) acceptable to all sides (Local Rule 3.25(g)(8)). If the
17 parties/counsel cannot agree on a joint verdict form, each party must separately file a proposed
18 verdict form.

19 **H. JOINT EXHIBIT LIST**

20 The parties/counsel shall prepare and file a joint exhibit list organized with columns
21 identifying each exhibit and specifying each party's evidentiary objections, if any, to admission of
22 each exhibit. The parties/counsel shall meet and confer in an effort to resolve objections to the
23 admissibility of each exhibit.

24 **I. PAGE AND LINE DESIGNATION FOR**
25 **DEPOSITION AND FORMER TESTIMONY**

26 If the parties/counsel intend to use deposition testimony or former trial testimony in lieu of
27 any witness's live testimony, the parties/counsel shall meet and confer and jointly prepare and file a
28 chart with columns for each of the following: 1) the page and line designations of the deposition or

1 former testimony requested for use, 2) objections, 3) counter-designations, 4) any responses thereto,
2 and 5) the Court's ruling.

3 **3. EVIDENTIARY EXHIBITS**

4 The parties/counsel shall jointly prepare (and be ready to temporarily lodge for inspection at
5 the FSC) three sets of tabbed, internally paginated by document, and properly-marked exhibits,
6 organized numerically in three-ring binders (a set for the Court, the Judicial Assistant and the
7 witnesses). The parties/counsel shall mark all non-documentary exhibits and insert a simple written
8 description of the exhibit behind the corresponding numerical tab in the exhibit binder. If the parties
9 have a joint signed exhibit list and electronic copies of their respective exhibits, then the
10 parties/counsel will not be required to produce exhibit binders at the FSC. However, the exhibit
11 binders will be required by the assigned trial judge when the trial commences. In the absence of
12 either a joint signed exhibit list or electronic copies, exhibit binders will be required to be produced
13 by all parties/counsel at the FSC.

14 **4. TRIAL BINDERS REQUIRED IN THE PI COURTS**

15 The parties/counsel shall jointly prepare (and be ready to temporarily lodge and include the
16 following for inspection at the FSC) the Trial Documents consisting of conformed copies (if
17 available), tabbed and organized into three-ring binders with a table of contents that includes the
18 following:

- 19 Tab A: Trial Briefs (Optional)
- 20 Tab B: Motions in Limine
- 21 Tab C: Joint Statement to Be Read to the Jury
- 22 Tab D: Joint Witness List
- 23 Tab E: Joint List of Jury Instructions (identifying the agreed upon and contested
24 instructions)
- 25 Tab F: Joint and Contested Jury Instructions
- 26 Tab G: Joint and/or Contested Verdict Form(s)
- 27 Tab H: Joint Exhibit List

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Tab I: Joint Chart of Page and Line Designation(s) for Deposition and Former Testimony


Tab J: Copies of the Current Operative Pleadings (including the operative complaint, answer, cross-complaint, if any, and answer to any cross-complaint).

The parties/counsel shall organize motions in limine (tabbed in numerical order) behind Tab B with the opposition papers and reply papers for each motion placed directly behind the moving papers. The parties shall organize proposed jury instructions behind Tab F, with the agreed upon instructions first in order followed by the contested instructions (including special instructions) submitted by each side.

5. FAILURE TO COMPLY WITH FSC OBLIGATIONS

The court has discretion to require any party/counsel who fails or refuses to comply with this Amended Standing Order to Show Cause why the Court should not impose monetary, evidentiary and/or issue sanctions (including the entry of a default or the striking of an answer).

Dated: Feb. 24, 2020



SAMANTHA P. JESSNER
Supervising Judge of Civil Courts